

**Pamela F Faggert**  
Chief Environmental Officer and Senior Vice President-Sustainability  
**Dominion Resources Services, Inc.**  
5000 Dominion Boulevard, Glen Allen, VA 23060  
dom.com



March 13, 2017

Mr. Mark Zolandz (3WP42)  
NPDES Enforcement Branch  
Water Protection Division  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103

**RE: EPA Information Requirement for Dominion Resources, Inc. –  
Supplemental Response**

Dear Mr. Zolandz:

Dominion Resources, Inc. ("Dominion") respectfully submits the following supplemental response to the above-referenced Information Requirement, which we received on January 12, 2017.

Based on our counsel's discussion with EPA's regional counsel, Douglas Frankenthaler, on January 12, and his follow-up written confirmation on January 19, we agreed to prioritize and expedite the production of certain responsive information on or before February 13, and to produce the remaining responsive information not later than March 15. We provided an initial response covering all responsive information related to items 19-30 on February 13, 2017, and we are now submitting all remaining, responsive information related to item 31.

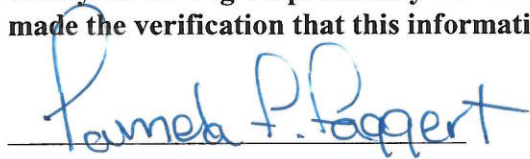
For convenience, we have included request 31 in italics followed by the relevant response. All supporting responsive documents are provided on the enclosed CD, which includes an index of documents.

This submission represents Dominion's good faith efforts to provide available, responsive, non-privileged documentation and information in its possession. This submission is made without waiver of any objections, defenses or other rights and should not be construed as an admission of any kind. Any inadvertent disclosure by Dominion of material protected by privilege is not intended, and should not be construed to constitute a waiver of such privilege. Dominion reserves the right to amend or supplement its response to provide additional relevant documents that later become known or available. Dominion is not waiving its right to object to authentication of the documents produced for the purpose of admissibility in any administrative or judicial proceeding.

Should you have any questions regarding our responses, please contact Cathy C. Taylor at (804) 273-2929 or [cathy.c.taylor@dom.com](mailto:cathy.c.taylor@dom.com).

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**I certify that the information contained in or accompanying this submission is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I certify as having responsibility for the persons who, acting under my direct instruction, made the verification that this information is true, accurate, and complete.**



Pamela F. Faggert  
Chief Environmental Officer and Senior Vice President - Sustainability

Enclosures

cc: Kathleen O'Connell (VA DEQ)

**DOMINION SUPPLEMENTAL RESPONSE TO EPA INFORMATION  
REQUIREMENT, CLEAN WATER ACT SECTION 308 (MARCH 15, 2017)**

In accordance with Instruction No. 6, in addition to Pamela F. Faggert, Chief Environmental Officer and Senior VP – Sustainability, the following Dominion employees assisted with compiling information and documents included in the response below:

Dominion Environmental Services

Jason Ericson, Environmental Projects Advisor  
Courtney Fisher, Environmental Consultant  
Ian Whitlock, Environmental Specialist III  
Camille Cook, Contractor

Dominion Virginia Power

Ben Saunders, Sr Siting and Permitting Specialist

Ms. Faggert, along with the Dominion Environmental Services employees listed above, are located at the Innsbrook Technical Center, 5000 Dominion Blvd., Glen Allen, VA 23060. Dominion Virginia Power personnel are located at One James River Plaza, 701 East Cary Street, Richmond, VA 23219. All employees can be contacted through Cathy Taylor at (804) 273-2929.

The following internal and external counsel assisted with compilation and preparation of Dominion's responses:

Clay Burns  
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Dominion Resources Services, Inc.  
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(804) 819-2278

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Troutman Sanders LLP  
1001 Haxall Point  
Richmond, VA 23219  
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### **SPECIFIC RESPONSE**

*No. 31: For calendar years 2014, 2015, 2016, for the below Dominion construction sites, provide 1) all self-inspection reports required by the NPDES permit number VAR 10 for discharges of stormwater from construction activities and 2) all documents issued by the Commonwealth, County and/or local authority to Dominion that identify noncompliance with the NPDES permit, including any warning letters, notices of violation (NOVs), compliance orders or similar documents:*

- a. Brunswick Power Station — VAR100578*
- b. Louisa Solar Project — VAR10I424*
- c. Hollymeade 230kV (Utility Line) — VAR100076*
- d. Brema Power Station — VAR10H875*
- e. Dominion Ash Haul Road and Bridge over Proctor's Creek — VAR10G662*
- f. Line 84 Red House Tap Rebuild — VAR10D652*
- g. Scott Solar Project — VAR10I027*
- h. TL 4 Brema Junction Rebuild — VAR10H648*

Response: Responsive documents available to Dominion are provided on the enclosed CD. Some of these documents reveal technical deviations from the relevant permit requirements (e.g., late inspection reports, missing dates on report forms, and brief delays beyond corrective action deadlines). For seven of the eight sites identified by EPA, the state and/or local stormwater authority has already conducted compliance inspections, and for one of these sites (Scott Solar), both the state and local stormwater authority initiated enforcement. Dominion has provided its full cooperation to those authorities and addressed their concerns. The TL 4 Brema Junction Rebuild project, which was initiated in 2016, has not yet received an inspection from the stormwater authority.

Dominion recognizes that for any deviations that have the potential for recurrence, the company has an important opportunity to implement not just corrective but also preventive actions at these eight sites and other construction sites across the enterprise. Dominion is preparing and has already begun implementing a construction stormwater corrective and preventive action plan. This plan, which can be used not only for these eight sites but others, as well, is designed to systematize repetitive requirements (e.g., inspection schedules, inspection forms and

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corrective action deadlines), enhance employee and contractor awareness and training, increase centralized compliance tracking during construction projects, and increase Dominion oversight of construction projects, particularly those implemented by contractors. Dominion is confident that this action plan, once fully implemented, will minimize the potential for recurrence.